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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

MINERVA MARTINEZ, SANDRA  
SCOTT, CARL GRAHAM, ANNE  
PARYS, DAVID ORTIZ, SEAN  
CHAMBERS and TIFFANY JAMES,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

NISSAN NORTH AMERICA, INC., and  
NISSAN MOTOR CO., LTD.

Defendants.

Case No. 3:22-cv-00354

CLASS ACTION

**SUPPLEMENTAL DECLARATION OF  
LANA COOPER RE: NOTICE  
PROCEDURES**

1 I, LANA COOPER, declare and state as follows:

2  
3 1. I am a Vice President with KCC Class Action Services, LLC (“KCC”), located in  
4 San Rafael, California. Pursuant to the Preliminary Approval Order of Class Action Settlement (the  
5 “Preliminary Approval Order”), dated August 17, 2022, the Court appointed KCC as the Claims  
6 Administrator in connection with the proposed Settlement of the above-captioned Action.<sup>1</sup> I have  
7 personal knowledge of the matters stated herein and, if called upon, could and would testify thereto.

8 2. The purpose of this declaration is to provide updated statistics based on my last  
9 declaration executed on January 10, 2023.

### 10 **SETTLEMENT WEBSITE**

11 3. Pursuant to Paragraph 67 of the Settlement Agreement, on December 15, 2022, KCC  
12 established a website [[www.AltimaSentraVersaCVTSettlement2022.com](http://www.AltimaSentraVersaCVTSettlement2022.com)] dedicated to this  
13 proposed settlement to provide information to the Class Members and to answer frequently asked  
14 questions. The website URL was set forth in the Summary Notice, Fleet Notice, Long-Form  
15 Notice, and Claim Form. Visitors to the website can download copies of the Long-Form Notice,  
16 Claim Form, Settlement Agreement and other case-related documents. Visitors can also submit  
17 claims online and upload supporting documentation. As of January 25, 2023, the website has  
18 received 38,297 visits.

### 19 **TELEPHONE HOTLINE AND EMAIL ADDRESS**

20  
21 4. KCC established and will continue to maintain, in accordance with Paragraph 67 of  
22 the Settlement Agreement, a toll-free telephone number (1-844-591-0204) and an email address  
23 ([admin@AltimaSentraVersaCVTSettlement2022.com](mailto:admin@AltimaSentraVersaCVTSettlement2022.com)) for potential Class Members to contact the  
24 Settlement Administrator to obtain information about the Settlement, and/or request a Long Form  
25

26 <sup>1</sup> All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the  
27 Settlement Agreement, dated August 1, 2022 (the “Settlement Agreement”) and/or the Preliminary  
28 Approval Order. 2

1 Notice and Claim Form. The telephone hotline became operational on December 15, 2022, and is  
2 accessible 24 hours a day, 7 days a week. As of January 25, 2023, KCC has received a total of  
3 15,303 calls to the telephone hotline. As of January 25, 2023, KCC has also received a total of 240  
4 emails to the email address.

### 5 **CLAIM FORMS**

6  
7 5. The postmark deadline for Class Members to submit a claim for reimbursement for  
8 a Qualifying Repair is March 15, 2023, or within thirty (30) days of the Qualifying Repair,  
9 whichever is later. To date, KCC has received 2,855 timely-filed claim forms. KCC expects  
10 additional timely-filed claims forms to arrive through the duration of the claims period. KCC has  
11 not yet reviewed the claim forms and supporting information for validity.

### 12 **REPORT ON EXCLUSION REQUESTS RECEIVED TO DATE**

13  
14 6. The Notice informs Class Members that any request for exclusion from the  
15 Settlement Class must be postmarked no later than February 13, 2023. As of the date of this  
16 Declaration, KCC has received 156 requests for exclusion. Of these, 3 requests did not include a  
17 signature; 2 requests did not include a signature or a VIN; 1 request did not include a VIN; and 19  
18 requests reflect a VIN that is not a Class Vehicle included in the Class List.

### 19 **OBJECTIONS TO THE SETTLEMENT**

20  
21 7. The receipt deadline for Class Members to object to the settlement is February 13,  
22 2023. The Notice informs Class Members to file objections with the Court and mail a copy to the  
23 Settlement Administrator. As of the date of this Declaration, KCC has received one (1) unsigned  
24 purported objection to the settlement, which KCC promptly forwarded to Co-Lead Class Counsel  
25 and NNA's counsel.

1  
2 I declare under penalty of perjury under the laws of the United States of America that the  
3 foregoing is true and correct.

4 Executed on January 26, 2023 at San Rafael, California.

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8 LANA COOPER  
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